



5 MINUTES
TO UNDERSTAND

GDPR, PRIMARY SCHOOLS AND KLASSROOM

Sensitive data,
Data processing,
Your personal data...



GDPR

what is it?

The objective of the GDPR (**General Data Protection Regulation**) is to allow the user to:

1

Understand what will be done of his data

2

Control the use of his data

especially if willing to delete or modify the data

Complying with the GDPR means respecting a set of logics to achieve this objective.



A personal data, how can we define it ?

It is information that identifies a user, directly or indirectly. For example: his name, first name, phone number, photo, etc. When a user creates an account on Classroom, we therefore collect "personal data".

A sensitive data, what is it?

Data is said to be "sensitive" when it includes information related, for example, to health, religious affiliation, etc. For example, if a parent advises the teacher via Classroom that their child will be absent because they have a fever or because there is a religious holiday, this is something considered « sensitive ».

What does Classroom recommend?

Classroom recommends that you do not provide such data when using the application. However, in the event that the user provides sensitive data, it is mandatory to obtain the user's consent before collecting it. This is the reason why Classroom requests user consent at the time of registration.

What is data processing?

The act of carrying out operations on personal data is called processing. For example, when a user creates an account on Classroom and enters personal information, it is said that Classroom is "processing" data.

What is a data controller ?

The personal data of the user is processed under the responsibility of the controller. For example, if the user wishes to delete his data, it is the role of the data controller to ensure that the data is deleted. In general, it ensures compliance with the provisions of the law known as "Information Technology and Liberties" and the GDPR.

What is a subcontractor in the GDPR sense ?

A data controller may have to entrust the processing to another entity. We then speak of subcontracting, the data controller and the subcontractor contract to validate compliance with the provisions of the law known as "Data Protection" and the GDPR.

A processing purpose, what is that ?

The purpose of data processing specifies what will be done with the data and what the purpose is.

Concerning Classroom ?

In the case of Classroom, the purpose of data processing is the functioning of the application, namely:

- Communication and collaboration between teacher and parents
- Subscription management (when parents have purchased a Premium Membership).

This data is neither sold nor rented to third parties as Classroom undertakes to do in its general conditions of use.



A data processing register, what is that ?

A data processing register is a sort of table which brings together all the information describing in particular what data is processed and what is done with it. It allows the data controller and the processor to have available all the information necessary to be able to intervene as quickly as possible on the data when the CNIL (Commission Nationale Informatique et Libertés), the data controller or a user will do so as a requirement.

And in public primary schools, how does it work?

In public primary schools, the DASEN, by delegation of rectors, are the data controllers. Thus all the applications and all the services, such as Classroom, which process data from teachers, parents of pupils, or pupils within the framework of the school are subcontractors and must be registered in the data processing registers of the DASEN.

And concerning Classroom ?

Concerning Classroom, all the information has been transmitted to the DASEN in all the 'academies' (academic districts in France) in order to allow Classroom to be registered in the different data processing registers as provided for by the GDPR.

Why do personal data have to be in France ?

Data does not have to be stored in France for a service to be GDPR-compliant. There are indeed many countries (especially countries of the European Union) which are considered to be trusted countries for the storage of data (list available on the CNIL website). However, it is essential to specify to the user where the data is stored.

And concerning Classroom ?

Regarding Classroom, personal data which is not media (for example messages exchanged within the application) is stored at OVH in the Roubaix datacenter (in the Paris area). Personal data which is media (photos, videos, documents) are stored in AWS servers in the Paris region. Our website, which does not contain any personal data, is hosted by OVH in their Montreal data center in Canada.

What does the data retention period mean?

The GDPR requires that unused data be deleted after a certain period of time in order to have only relevant and up-to-date data.

And concerning Classroom ?

Concerning Classroom, after 2 years of inactivity, the user is notified one month before the deletion of his data. Without positive action on his part to request the conservation of his data, the data is deleted.



What steps has Classroom taken to comply with the GDPR?

Even before the arrival of the GDPR, Classroom had at the heart of its concerns the respect of the personal data of its users.

The entire design of the application, the choice of its economic model, etc. was done with a sacred rule:

User data will **NEVER** be used for purposes other than the proper functioning of the Classroom application and its various services.

Constant legal monitoring

Since the beginning Classroom has therefore made a point of honor on these subjects by being accompanied by legal advisers with competence in the respect of the protection of personal data.

Collaboration with different departments

Klassroom has also worked from the start in consultation with various departments of the French Ministry of Education as well as the Digital Department for Education with which Classroom signed an experimentation agreement in 2016 and more recently with the delegate for the protection of data on GDPR aspects, at the Ministry.

GDPR compliance confirmed

Klassroom was also audited on its GDPR compliance by a law firm at the request of an academic district in France, as well as on aspects of application security by a company specialized in computer security. These two audits gave positive conclusions.

